

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Oral Argument Requested

**NOTICE OF THE TEVA DEFENDANTS' MOTION TO SEAL EXHIBITS  
TO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION OF  
CONSUMER ECONOMIC LOSS CLAIMS (Dkt. [1748](#))  
PURSUANT TO LOCAL CIVIL RULE 5.3(c)**

**PLEASE TAKE NOTICE** that on January 3, 2023, or as soon as counsel may be heard, counsel for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis, LLC, and Actavis Pharma, Inc., (collectively, the "Teva Defendants" or "Teva") shall move for entry of an Order sealing Exhibits 16, 66, 67, 72, 88, 90, and 97 to Plaintiffs' Motion for Class Certification of Consumer Economic Loss Claims (Dkt. [1748](#)), pursuant to Local Civil Rule 5.3(c) and the Amended Confidentiality and Protective Order (Dkt. [1661](#)) entered in this case.

**PLEASE TAKE FURTHER NOTICE** that in support of their motion, the Teva Defendants shall rely upon the accompanying Declaration of Brian H. Rubenstein, dated December 2, 2022; the Declaration of Anthony R. Binsol, dated November 29, 2022, attached as **Exhibit A** thereto; an Index identifying the

documents the Teva Defendants seek to seal, attached as **Exhibit B** thereto; and any submissions made hereafter in further support of their motion; and

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith, including Proposed Findings of Fact and Conclusions of Law pursuant to Local Civil Rule 5.3(c)(6); and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

Dated: December 2, 2022

By: /s/ Brian H. Rubenstein

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*Industries Ltd., Actavis LLC, and Actavis*

*Pharma, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 2, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Gerond J. Lawrence

Gerond J. Lawrence  
Greenberg Traurig, LLP